## Arent Fox

February 25, 2011

VIA ECFS

Marlene Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re:

CPNI Certification, EB 06-36

Dear Ms. Dortch:

On behalf of Great Lakes Communication Corp., enclosed please find the company's annual CPNI certification for filing in the above-referenced docket. Please contact me at (202) 857-6104 if you have any questions regarding this filing.

Respectfully submitted,

/s/

Katherine E. Barker Marshall

Attachment

cc:

Best Copy and Printing (via e-mail)

Katherine E. Barker Marshall

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## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual §64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010.

- 1. Date filed: February 25, 2011
- 2. Name of company(s) covered by this certification: Great Lakes Communication, Corp.
- 3. Form 499 Filer ID: 825621
- 4. Name of signatory: Josh Nelson
- 5. Title of signatory: President
- 6. Certification:

I, Josh Nelson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 at seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq*. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: / CSU 15 Date: Fell 25, 2011

Attachment: Accompanying Statement Explaining CPNI Procedures

## Great Lakes Communication Corp. 1713 McNaughton Way Spencer, IA 51301

Re: Docket No. 06-36

Statement of CPNI Operating Procedures

Date: February 25, 2011

Great Lakes Communication Corp. ("Great Lakes") has implemented procedures regarding its customers' Customer Proprietary Network Information ("CPNI") that comply with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. §222) and 47 CFR §§ 64.2001 *et seq*. Any and all use of Great Lakes customers' CPNI complies with the Commission's rules in 47 CFR §§64.2001-64.2011.

In accordance with Commission Rules, Great Lakes may use, disclose, or permit access to CPNI for the following purposes: (1) to initiate, provision, render, and bill and collect for the telecommunications services from which such information is derived; (2) to provide the services necessary to, or used in, the provision of the telecommunications services that Great Lakes provides, including in the publishing of directories; (3) to protect its rights and property, or to protect our customers and other carriers from fraudulent, abusive or unlawful use of, or subscription to, its services.

Great Lakes' employees, including marketing and sales personnel and customer service representatives, have been educated about CPNI, federal regulations regulating the use and disclosure of CPNI, and Great Lakes' statutory responsibility to its customers.

Specifically, Great Lakes does not sell, rent or otherwise disclose customers' CPNI to other entities, and it does not currently use, or allow its affiliates to use, any customer CPNI in marketing activities.

Furthermore, Great Lakes has implemented appropriate safeguards for the disclosure of CPNI, including instituting procedures to (1) authenticate customers prior to disclosure of CPNI based on customer-initiated telephone contact, online account access, or an in-store visit (e.g. use of verbal or online passwords without the use of readily available biographical or account information, or requiring a valid photo ID matching the customer's account information); and (2) providing notification to customers of account changes.

A violation of Great Lakes' operating procedures will result in disciplinary action. For a

first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination for a second violation.

Great Lakes has also established procedures to notify law enforcement in the event of a breach of its customers' CPNI.

Please direct all inquiries regarding this submission to the following:

Josh Nelson President Great Lakes Communication Corp. 1713 McNaughton Way Spencer, IA